

# **Exhibit 45, Part 4**



## Claim to Relief from Danish Dividend Tax

I am in my capacity as beneficial owner       On behalf of the beneficial owner

Claim is made for refund of Danish dividend tax, in total DKK: 4730400.00

Beneficial Owner  
Full name  
RJM Capital Pension Plan

Full address  
1010 Fifth Avenue - Suite 1D, New York  
NY 10028  
USA

E-mail  
clientservices@goalgroup.com

Signature  
Beneficial owner/applicant




*If the claim is made on behalf of the beneficial owner the applicant's power of attorney shall be enclosed*

As documentation is enclosed dividend advice(s), number: 2

*(This documentation is obligatory)*

Financial institution  
The amount is requested to be paid to:

Name and address  
Goal TaxBack Ltd  
NatWest Bank  
High Street Branch Croydon

34015159

Reg. no                          Account no

SWIFT	<u>NWBKGB2L</u>	<u>IBAN GB88NWBK60730134015159</u>
	<u>BLZ</u>	<u>IBAN</u>

On reclaim please quote:-000 DK 57

Certification of the competent authority  
It is hereby certified that the beneficial owner is covered by the Double Taxation Convention concluded between Denmark and U.S.A.

Date

Official stamp and signature

2010/07 (GJ-AF U 2001)

When signed to be forwarded to:

Skatteccenter Høje-Taastrup  
Postboks 60  
DK-2630 Taastrup

06.003 ENG

SKAT Fredensborg

Bilag nr. 219-A-032



4 Throgmorton Avenue  
London EC2N 2DL

### DIVIDEND CREDIT ADVICE

Issue Date: 17th April 2013, Issue No: 285

**RJM Capital Pension Plan**  
1010 Fifth Avenue  
Apt 1D  
New York  
NY 10028  
United States of America

Date: 17th April 2013

Dear Sirs,

Please be advised that we have credited your account RJM01, for the value date of 17th April 2013. This payment represents the dividend as shown below:

Security Name:	AP MOELLER-MAERSK A/S - B SHARES
Sedol:	4253048
ISIN:	DK0010244508
Pay Date:	17th April 2013
No of Shares:	10,400
Gross Dividend:	DKK 12,480,000.00
Tax:	DKK 3,369,600.00
Net Dividend:	DKK 9,110,400.00

  
Name: Jas Bains  
Solo Capital Partners LLP

Solo Capital Partners LLP is authorised and regulated by the Financial Conduct Authority of the FCA Registration Number 365433, Company Number OC367979, VAT Registration Num-

SKAT Fredensborg

Bilag nr. 219-A-033



**Solo Capital**

4 Throgmorton Avenue  
London EC2N 2DL

**DIVIDEND CREDIT ADVICE**

Issue Date: 17th April 2013, Issue No: 265

**RJM Capital Pension Plan**  
1010 Fifth Avenue  
Apt 1D  
New York  
NY 10028  
United States of America

Date: 17th April 2013

Dear Sirs,

Please be advised that we have credited your account RJM01, for the value date of 17th April 2013. This payment represents the dividend as shown below:

Security Name:	AP MOELLER-MAERSK A/S - A SHARES
Sedol:	4253059
ISIN:	DK0010244425
Pay Date:	17th April 2013
No of Shares:	4,200
Gross Dividend:	DKK 5,040,000.00
Tax:	DKK 1,360,800.00
Net Dividend:	DKK 3,679,200.00

Name: Jas Bains  
Solo Capital Partners LLP

Solo Capital Partners LLP is authorised and regulated by the Financial Conduct Authority of the United Kingdom (FCA Registration Number 606533). Company Number OC367979. VAT Registration Number GB 850 0000 00.

**SKAT Fredensborg**

Bilag nr. 219-A-034

*RJM Capital Pension Plan  
1010 Fifth Avenue – Suite 1D  
New York, NY 10028*

*Power of Attorney*

THIS POWER OF ATTORNEY, made this 21<sup>st</sup> day of March 2013 by RJM Capital Pension Plan ("the Pension Plan") WITNESSETH AS FOLLOWS:-

1. The Pension Plan hereby appoints Goal TaxBack, ("GTB") to be the attorney of the Pension Plan and in the Pension Plan's name and otherwise on the Pension Plan's behalf and as the Pension Plan's act and deed to sign, seal, execute, deliver, perfect and do all deeds, instruments, acts and things which may be required (or which GTB shall consider requisite) for or in connection with the provision of any tax services provided to the Pension Plan from time to time, including the reclaiming from any taxation authority in any jurisdiction (as appropriate) amounts in respect of payments made to the Pension Plan, or through GTB on behalf of the Pension Plan. The Pension Plan also authorises GTB to set the procedure to collect the amounts claimed.
2. The Pension Plan shall ratify and confirm all transactions entered into, documents executed and things done by GTB or its delegates by virtue of the Power Of Attorney given by Clause 1 of this deed unless it is proved that GTB or its delegates have acted with negligence, willful default or fraud.
3. The Pension Plan agrees to indemnify GTB against all costs, liabilities and expenses including (without limitation) any reasonable legal fees and disbursements arising directly or indirectly out of the exercise or purported exercise of GTB's powers under this deed PROVIDED THAT GTB shall not be indemnified against any such liabilities, costs and expenses arising out of GTB or any nominee's or agent's or delegates own willful default, negligence or fraud.
4. The Pension Plan declares that any person dealing with GTB shall not be concerned to see or enquire as to the proprietary or expediency of any act, deed, matter or thing which GTB may do or perform in the Pension Plan's name by virtue of this deed.
5. This deed shall be revocable on the unilateral act of the Pension Plan, provided that GTB is given at least 5 working days notice of such revocation. The provisions of Clauses 2 and 3 shall survive termination of this deed.
6. This deed shall be governed by and construed in accordance with English law, and the Pension Plan hereby irrevocable submits to the non-exclusive jurisdiction of the English courts.

(contd)

SKAT Fredensborg

Bilag nr. 219-A-035

IN WITNESS whereof this deed has been executed by the Pension Plan and is intended to be and is hereby delivered on the date above written.

**Execution of a deed by a pension plan incorporated outside Great Britain**

*Executed as a deed by -*

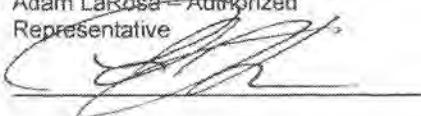
*Name of pension plan:*

RJM Capital Pension Plan

*Acting by name(s) of:*

Adam LaRosa = Authorized Representative

*Duly authorised signatory(ies):*



SKAT Fredensborg

Bilag nr. 219-A-036



DEPARTMENT OF THE TREASURY  
INTERNAL REVENUE SERVICE  
PHILADELPHIA, PA 19255

CERTIFICATION  
PROGRAM

Date: March 18, 2013



000465

Taxpayer: RJM CAPITAL PENSION PLAN  
TIN: 46-1910855  
Tax Year: 2013

I certify that, to the best of our knowledge, the above-named entity is a trust forming part of a pension, profit sharing, or stock bonus plan qualified under section 401(a) of the U.S. Internal Revenue Code, which is exempt from U.S. taxation under section 501(a), and is a resident of the United States of America for purposes of U.S. taxation.

Nancy J. Aiello  
Field Director, Accounts Management

SKAT Fredensborg

Bilag nr. 219-A-037



SKAT  
P.O. Box 60  
2630 Taastrup  
DENMARK

Our Ref: BDK000065  
Tax Ref: 46-1910855

26 April 2013

Dear Sir or Madam,

**RE: A/C RJM Capital Pension Plan RJM01**

Please find enclosed a tax reclaim form, together with evidence of payment and tax deduction paid on the above client's securities.

Kindly arrange for the reclaim payment to be credited to the account of Goal TaxBack Limited, details as follows:

*NatWest Bank*  
*High Street Branch Croydon Surrey*  
*BIC NWBKGB2L*  
*IBAN GB88 NWBK 6073 0134 0151 59*

Please quote reference **BDK000065**.

Would you please confirm safe receipt of this reclaim by sending an email to [clientservices@goalgroup.com](mailto:clientservices@goalgroup.com) or by signing the attached copy of this letter and returning to the address shown below.

Yours faithfully,

A handwritten signature in black ink, appearing to read "MN".

Marie Nimmo  
Operations Manager

GOAL TAXBACK LIMITED

7th Floor, 59 Park Lane, Croydon, Surrey CR0 1DG  
+44 (0)208 765 7180 | +44 (0)208 801 2854  
[info@goalgroup.com](mailto:info@goalgroup.com)

Registered in England & Wales  
Registered Office: 7th Floor, 59 Park Lane, CR0 1DG  
Registered for VAT under number

**SKAT Fredensborg**

Bilag nr. 219-A-038



## Claim to Relief from Danish Dividend Tax

 In my capacity as beneficial owner On behalf of the beneficial owner

Claim is made for refund of Danish dividend tax, in total DKK: 1123200.00

## Beneficial Owner

Full name  
RJM Capital Pension PlanFull address  
1010 Fifth Avenue - Suite 1D, New York  
NY 10028  
USAE-mail  
clientservices@goalgroup.comSignature  
Beneficial owner/applicant



*If the claim is made on behalf of the beneficial owner the applicant's power of attorney shall be enclosed*

As documentation is enclosed dividend advice(s), number:

1

(This documentation is obligatory)

## Financial institution

The amount is requested to be paid to:

Name and address  
Goal TaxBack Ltd  
NatWest Bank  
High Street Branch Croydon

34015159

Reg. no.

Account no.

SWIFT

NWBKGB2L

IBAN GB88NWBK60730134015159

BLZ

IBAN

On reclaim please quote:-000 DK 65

## Certification of the competent authority

It is hereby certified that the beneficial owner is covered by the Double Taxation Convention concluded between Denmark and U.S.A.

Date

Official stamp and signature

2010/07 (gældt i U 200)

06.003 ENG

When signed to be forwarded to:

Skattecenter Høje-Taastrup  
Postboks 60  
DK-2630 Taastrup

SKAT Fredensborg

Bilag nr. 219-A-039



**Solo Capital**

4 Throgmorton Avenue  
London EC2N 2DL

### DIVIDEND CREDIT ADVICE

Issue Date: 24th April 2013, Issue No: 305

**RJM Capital Pension Plan**  
1010 Fifth Avenue  
Apt 1D  
New York  
NY 10028  
United States of America

**Date: 24th April 2013**

Dear Sirs,

Please be advised that we have credited your account RJM01, for the value date of 24th April 2013. This payment represents the dividend as shown below:

Security Name:	TRYG A/S
Sedol:	BOLL2W7
ISIN:	DK0060013274
Pay Date:	24th April 2013
No of Shares:	160,000
Gross Dividend:	DKK 4,160,000.00
Tax:	DKK 1,123,200.00
Net Dividend:	DKK 3,036,800.00

Name: Jas Bains  
Solo Capital Partners LLP

Solo Capital Partners LLP is authorized and regulated by the Financial Conduct Authority of the FCA Registration Number 966535, Company Number OC367979, VAT Registration Number

**SKAT Fredensborg**

Bilag nr. 219-A-040